Setting Standards for Excellence

NEMA comments to Washington State Energy Code (WSEC) proposal 09-139:

NEMA objects to requiring high-efficiency lighting at the levels proposed (and existing in the 2009 IECC, in fact). These proposals in effect require use of CFLs, which are not best for all applications and, when forced, result in refit/regression and hampered consumer acceptance. Our market and industry data point to alternative solutions to recommend the use of high-efficiency lighting AND-OR lighting controls.

Additionally, NEMA believes that codes, to be effective, must be enforceable and sustainable in the long term. The enforcement community is already understaffed and overworked, and the current state and local situation means that the situation will not improve in the foreseeable future. Particularly in Washington, where electrical inspection does not include energy code enforcement under the State L&I Electrical Program, and city enforcement ranges from stringent to non-existent, any provision that depends on a higher cost, consumer replaceable product offers questionable initial and long-term energy savings. City and county building departments as well are undertrained and understaffed to take on the additional responsibilities of counting lamps.

A recent NEMA economic report indicates that consumers are already turning back to incandescent lamps as a budget saving measure due to the economic downturn. This is evidence that attempting to regulate lamp efficacy in the residential environment will not yield consistent long term results. In order for this savings to be viable over the long term, it is felt that consumer education will result in wide-spread voluntary consumer acceptance that will be far more effective than questionable mandatory enforcement. As opposed to earlier models, today's CFLs product light outputs better than most of the most popular incandescent types. Improved color has removed some of the aesthetic objections for residential use, although the size, appearance, and color are still barriers for many residential decision makers, as is initial cost.

It should be noted that NEMA and the Lighting Division enthusiastically supports and promotes the use of compact fluorescent lamps, as well as other developing high-efficient lighting technologies. While we recognize that calculating the energy savings potential in switching to CFL's results in a significant calculated energy savings, that savings is on paper, and will not result in real world reductions near what would be indicated. The Lighting Division believes that increased consumer acceptance of efficient lighting technology combined with advanced, effective controls of lower efficacy lamps, is a better approach and will result in long-term, sustainable energy savings. NEMA has submitted a package of proposals to promote this approach to the ICC for the 2012 Edition of the IECC.

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